

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JUDICIAL WATCH, INC. and )  
TRUE THE VOTE, )  
 )  
*Plaintiffs,* ) Case No. 2:12-cv-792-EAS-TPK  
 )  
v. ) Judge Edmund A. Sargus, Jr.  
 )  
JON HUSTED, Ohio Secretary of State ) Magistrate Judge Terence P. Kemp  
in his official capacity, )  
 )  
*Defendant.* )

---

**JOINT MOTION TO EXTEND DISCOVERY AND  
DISPOSITIVE MOTION DEADLINES**

---

In accordance with Local Rule 16.2, the parties jointly move for a **two week** extension of the discovery and dispositive motion deadlines. The current discovery deadline is October 31, 2013, and the current dispositive motion deadline is November 29, 2013. The parties are engaged in ongoing and serious settlement negotiations which may lead to a resolution of the case. They wish to complete that process without having to simultaneously complete discovery and draft dispositive motions. No trial date has been set, so the requested extension will not affect a trial date. This is the first request of any party for an extension of the case schedule. Accordingly, the Parties jointly request that the discovery and dispositive motion deadlines be extended by two weeks, as follows:

EVENT	NEW DATE
Discovery Cut-Off:	November 14, 2013
Dispositive Motion Deadline:	December 13, 2013.

A proposed order is attached to this motion.

Respectfully submitted,

For the Defendant:

MICHAEL DEWINE  
Ohio Attorney General

*/s/ Kristopher J. Armstrong*

---

Kristopher J. Armstrong (0077799)  
Ryan M. Richardson (0090382)  
Assistant Attorneys General  
Constitutional Offices Section  
30 East Broad Street, 16th Floor  
Columbus, Ohio 43215  
Tel: (614) 466-2872  
Fax: (614) 728-7592  
kristopher.armstrong@ohioattorneygeneral.gov  
ryan.richardson@ohioattorneygeneral.gov

*Attorneys for Defendant*

For the Plaintiffs:

*/s/ Chris Fedeli*

---

Chris Fedeli  
Paul J. Orfaneses  
Robert D. Popper  
*Admitted Pro Hac Vice*  
JUDICIAL WATCH, INC.  
425 Third Street S.W., Ste. 800  
Washington, DC 20024  
Tel: (202) 646-5172  
Fax: (202) 646-5199  
cfedeli@judicialwatch.org  
porfanedes@judicialwatch.org  
rpopper@judicialwatch.org

David R. Langdon (0067046)  
Joshua B. Bolinger (0079594)  
LANGDON LAW LLC  
8913 Cincinnati-Dayton Rd.  
West Chester, Ohio 45069  
Tel: (513) 577-7380  
Fax: (513) 577-7383  
dlangdon@langdonlaw.com  
jbolinger@langdonlaw.com

J. Christian Adams  
*Admitted Pro Hac Vice*  
300 N. Washington Street, Ste. 405  
Alexandria, VA 22314  
adams@electionlawcenter.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of October, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Kristopher J. Armstrong

Kristopher J. Armstrong  
Assistant Attorney General